CAPILANO UNIVERSITY	POLICY		
Policy No.	Officer Responsible		
OP.421	**Vice President, Finance and Administration**		
Policy Name			
Security Technology - Surveillance Systems			
Approved by	Replaces	Category	Next Review
SLC	**E.210 Video Surveillance**		**May 2026**
Date Issued	Date Revised	Related Policies	
May 2023	**April 2, 2025**	**B.700 Privacy and Access to Information**	

1. PURPOSE

1.1 This policy regulates video surveillance installations, monitoring and recording on Capilano University (the "University") properties and in its facilities, and ensures appropriate use of surveillance systems and content, consistent with the *Freedom of Information and Protection of Privacy Act* (FIPPA), *The University Act* and other applicable legislation, and University policies and procedures.

2. DEFINITIONS

"Employee" any person employed by the University, including volunteers.

"Lessee" a person, or business, who holds a lease of a property; a tenant.

"Student" an individual enrolled in any course (credit or non-credit) at the University.

"University community" employees, students, board members and volunteers.

"University Premises or Property" any University owned or rented/leased lands, facilities, or vehicle or other transportation conveyance, including on-line forum.

"Video surveillance" a system of monitoring activity in an area or building using a camera and recording system

"Visitor or Guest" non-University community members (including alumni and donors) visiting any University Property or Premises or participating in a University-Event.

3. SCOPE

3.1 This policy is applicable on all University Premises or Property that currently have, or in the future may have, video surveillance cameras.

3.2 This policy does not address live video streaming for internet, or “web cams”, for either operational or academic purposes; or, the recording of lectures or meetings in on-line forums.

3.3 Under this policy, the University does not have purview over the Ts’zil Learning Centre or any areas outside of University Property or Premises.

4. POLICY

4.1 Video surveillance is an integral part of the security operations at the University.

4.2 Video surveillance cameras will be in operation on a 24-hour basis as a means of monitoring activities throughout the University to:

a) enhance the safety of students, employees, service providers and Visitors or Guests;

b) protect University property against theft or vandalism;

c) aid in the identification of individuals engaged in potentially criminal activities or in activities disruptive to University operations;

d) discourage or prevent criminal or disruptive activity;

e) conduct investigations; and

f) monitor wildlife on campus that may pose safety concerns.

4.3 Information will not be retained, beyond the retention periods ascribed in the *Limitations Act* or used for purposes other than those described above

4.4 Video surveillance cameras will not:

a) be used to actively monitor employee performance,

b) be equipped to capture or record audio data,

c) be installed in areas where there is a reasonable expectation of privacy, such as bathrooms and changing rooms.

Personal information is collected and disclosed in accordance with FIPPA.

4.5 Privacy-Intrusive Camera Systems will only be approved in rare and exceptional cases where clear and specific grounds exist that make it necessary to use them.

4.6 Computer monitors used to review video surveillance recordings will be located in a secure area and restricted to authorized persons. Surveillance images must not be accessible or viewable by non-authorized persons without either a “need to know” for the performance of their duties and / or in accordance with the provisions of this Policy and FIPPA.

4.7 Biometric pattern matching information will only be used for video surveillance system alerts in situations where it is determined that there is a significant risk to the safety of individuals or the

environment, and with the written approval of the Director Safety & Emergency Services or their assigned delegate.

4.8 Video recording and review will be conducted in a professional, ethical and legal manner, consistent with B.701 Privacy and Access to Information Policy. Personnel involved in video recording and review will be appropriately trained and continuously supervised in the responsible use of this technology. Logs will be kept of all instances where recorded information has been accessed. Logs will detail who has accessed the recorded personal information, and how it was used.

4.9 Violation of this policy and supporting Campus Security video surveillance protocols will result in disciplinary action appropriate to the violation.

4.10 To maintain an informed University community, the Office of Safety & Emergency Services will, publish information on the University website describing the purpose of video surveillance, the legal authority and contact information for the University's Security Operations and the Privacy Officer.

4.11 Signage will be posted at all camera locations to inform the University community of the presence of video surveillance; it will include a link to the webpage, and a contact number for Campus Security.

4.12 Any student, employee, service provider, Visitors or Guests who has been recorded by a video surveillance camera has the right to access their personal information under FIPPA by contacting the Office of Safety & Emergency Services. The Director of Safety & Emergency Services will work with the Manager, Security Operations and Parking Services and/or the Manager, Security Technology and Access on all requests, and inform the Privacy Officer. The University will withhold the personal information of individuals who are not the subject of the access request.

4.13 The University will use and disclose footage obtained through the Camera System only as authorized by FIPPA, including to address and investigate incidents and to make appropriate reports to law enforcement authorities. All disclosures must be forwarded to the Director of Safety & Emergency Services who will work with the Manager, Security Operations and Parking Services and/or the Manager, Security Technology and Access, in conjunction with the Privacy Officer.

4.14 A Privacy Impact Assessment (PIA) will be completed when significant changes are made to the video surveillance system, by the Office of Safety & Emergency Services and submitted to the Privacy Officer for review and approval.

4.15 The PIA will consider:

a) Is video surveillance recording necessary to deliver a program or activity by the University?

b) Is video surveillance recording effective in meeting the objectives defined above?

c) Have other alternatives been explored?

d) In considering other alternatives, cost should be the last factor taken into consideration.

e) Is the loss of privacy proportional to the benefit gained by the University's use of surveillance cameras and video recordings?

f) What steps has the University taken in order to ensure the minimum amount of personal information is being recorded?

5. RETENTION

5.1 All recorded information will be destroyed after 30 days except information:

a) used in an internal investigation, consistent with the *Limitations Act* and the University Records Retention Schedule.

b) specifically awaiting review by law enforcement agencies, and

c) information seized as evidence, or information that has been duplicated for use by law enforcement agencies.

6. COMPLAINTS

6.1 Any complaints relating to the installation or operation of the video surveillance system should be addressed to, and will be managed by the Director of Safety & Emergency Services. Complaints relating to the collection, use, retention or storage of personal recorded information may be escalated to the Privacy Officer.

7. PRIVACY BREACHES

7.1 Privacy breaches are managed under the B.700.1 Personal Information Incident Management Procedure.

8. RESPONSIBILITIES

8.1 The Director of Safety & Emergency Services is responsible for:

a) ensuring that the University has adequate resources to operate and maintain a video surveillance system in accordance with this policy;

b) ensuring that the video surveillance system is audited on a regular basis, in conjunction with the Privacy Officer, and

c) ensure that the video surveillance system complies with B.700 Privacy Access to Information Policy and all relevant FIPPA requirements.

8.2 The Director of Safety & Emergency Services may delegate specific duties regarding the operation and maintenance of the system.

8.3 The Manager, Security Technology & Access, is responsible for:

a) overseeing and coordinating the video surveillance system at the University to ensure consistent and standard application across the campuses and facilities;

b) making sure written protocols for the installation, operation and monitoring of video surveillance systems are in place;

c) auditing video surveillance protocols and equipment at least annually and addressing any deficiencies or concerns identified; and

d) reviewing and evaluating the video surveillance system, at least once every calendar year, to ascertain whether it is still required in part of whole.

8.4 The Privacy Officer is responsible for:

a) supporting the Manager, Security Technology and Access with audits and reviews of the video surveillance system, reviewing and approving all updated PIAs conducted when significant changes are made or the system is updated.

b) providing advice on management of requests to release video surveillance records.

9. DESIGNATED OFFICER

9.1 The Vice President, Finance and Administration is the Policy Owner, responsible for the oversight of this Policy. The Administration of this Policy and the development, subsequent revisions to and operationalization of any associated procedures is the responsibility of the Director of Safety & Emergency Services.

10. RELATED REFERENCES

Freedom of Information and Protection of Privacy Act (FIPPA)

University Act [RSBC 1979]

Limitation Act [RSBC 1996]

Administrative Records Classification System [2014]

Using Overt Video Surveillance, Office of the Information & Privacy Commissioner for British Columbia